

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	Criminal No.	5:19-CR- 21 (GTS)
)		
v.)	Indictment	
)		
STEPHEN J. TAUBERT,)	Violations:	18 U.S.C. § 115
)		[Influencing, impeding, or
Defendant.)		retaliating against a Federal
)		official]
)		18 U.S.C. § 875
)		[Threat in Interstate
)		Communication]
)		18 U.S.C. § 879
)		[Threats against former
)		Presidents]
)		
)	3 Counts	
)		
)	County of Offense:	Onondaga

THE GRAND JURY CHARGES:

COUNT 1

[Influencing, impeding, or retaliating against a federal official]

On or about July 20, 2018, in Onondaga County in the Northern District of New York and elsewhere, the defendant, **STEPHEN J. TAUBERT**, threatened to murder a United States official with intent to impede, intimidate, or interfere with such official while engaged in the performance of official duties and with the intent to retaliate against such official on account of the performance of official duties, in that defendant **STEPHEN J. TAUBERT** made a telephone call to the office of a Member of Congress and threatened to kill her, in violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT 2
[Threat in Interstate Commerce]

On or about July 20, 2018, in Onondaga County in the Northern District of New York and elsewhere, the defendant, **STEPHEN J. TAUBERT**, transmitted in interstate commerce from the State of New York to the State of California a telephone communication containing a threat to injure the person of another, in that defendant **STEPHEN J. TAUBERT** made a telephone call to the office of a Member of Congress and threatened to kill her and her employees, in violation of Title 18, United States Code Section, 875(c).

COUNT 3
[Threats against former Presidents]

On or about June 2, 2017, in Onondaga County in the Northern District of New York, the defendant, **STEPHEN J. TAUBERT**, knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States of America, in that the defendant made multiple telephone calls to the office of a then-Member of Congress and threatened to kill a former President, in violation of Title 18, United States Code, Section 879.

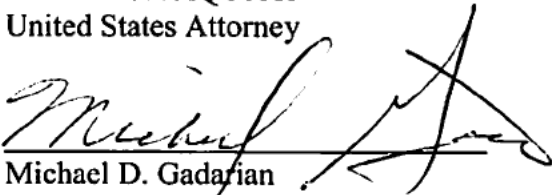
Dated: January 16, 2019

A TRUE BILL,


Grand Jury Foreperson

GRANT C. JAQUITH
United States Attorney

By:


Michael D. Gadarian
Assistant United States Attorney
Bar Roll No. 517198